

1 HONORABLE JOHN H. CHUN
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 KURT A. BENSHOOF, A.R.W. by and
10 through his father, KURT A. BENSHOOF,
BRETT FOUNTAIN, URVE MAGGITI,
11 Plaintiffs,

12 v.
13 ANDREA CHIN, ANTHONY BELGARD,
DONOVAN BROUSSARD, NATHAN
CLIBER, CATHERINE CORNWALL,
GREGG CURTIS, JANE DOE, JENNY
DURKAN, JOHN DUUS, NICHOLAS
EVANS, PASCAL HERZER, RYAN ELLIS,
MICHAEL FOX, TYLER GOSLIN, JULIE
KLINE, ERNEST JENSEN, JONATHAN
KIEHN, SPENCER KURZ, MAGALIE
LERMAN, RICHARD LIMA, ADAM
LOSLEBEN, YVES LUC, SARAH
14 MACDONALD, JACOB MASTERSON,
GRANT MAYER, STEVEN MITCHELL,
15 JOHNATHAN MUSSEAU, BREHON NESS,
LILIYA NESTERUK, STEPHEN
OKRUHLICA, KATRINA OUTLAND,
16 JESSICA OWEN, SARAH PENDLETON,
DWAYNE PIRAK, BRIAN REES, BLAIR
RUSS, JULIE SALLE, DANIEL
17 SCHILLING, TY SELFRIDGE, NATHAN
SHOPAY, STEVEN STONE, MICHAEL
TRACY, MELANIE TRATNIK, SARAH
18 TURNER, TREVOR TYLER, MICHAEL
VIRGILIO, ANDREW WEST, CHAD
20 ZENTNER, in their individual capacities,
CITY OF SEATTLE, KING COUNTY,
21 Defendants.

22 NO. 2:24-cv-00808-JHC

23 DECLARATION OF NATHAN CLIBER IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION
TO DISQUALIFY

24 NOTE ON MOTION CALENDAR:

25 APRIL 7, 2025

1 I, Nathan Cliber, declare under penalty of perjury pursuant to the laws of the United
 2 States and the State of Washington, as follows:

3 1. I am over the age of 18 and am competent to testify to the facts stated in this
 4 declaration. I have personal knowledge of the facts set forth in this declaration, and could testify
 5 competently to them if called upon to do so.

6 2. I am a family law attorney based in Seattle, Washington. I represented Jessica
 7 Owen in a parentage action in King County, Washington, KCSC 21-5-00680-6 SEA, involving
 8 Plaintiff Kurt Benshoof and Ms. Owen and Mr. Benshoof's son, A.R.W., in 2022. Mr. Benshoof
 9 has sued me personally in many lawsuits across state and federal courts due to my representation
 10 of Mr. Owen.

11 3. I am aware of the potential conflicts inherit in my and Blair Russ's joint
 12 representation by Michael Tracy and Sarah Turner, including that they have been named as
 13 defendants in this lawsuit, and understand and have consented to their joint representation.

14 4. I retained Mr. Tracy and Ms. Turner in the present lawsuit, in part, because of the
 15 now years of experience they have gained in responding to and dismissing Mr. Benshoof's
 16 baseless claims and abusive litigation tactics, and I would be severely prejudiced if the Court
 17 were to grant Plaintiffs' Motion and force me to retain new counsel.

18 5. I believe that my, Mr. Russ's, and Mr. Tracy and Ms. Turner's interests in
 19 defending against and dismissing Mr. Benshoof's meritless claims are aligned.

20 I declare under penalty of perjury under the laws of the United States of America and the
 21 State of Washington that the foregoing is true and correct.

22 Signed on this 1st day of April, 2025, at Seattle, King County, Washington.

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Nathan Cliber

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States and the State of Washington that on April 1, 2025, the foregoing document was served upon the following parties in the manner indicated below:

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Atorneys for Defendant City of Seattle

Dated: March 31, 2025

s/ Marry Marze
Marry Marze, Legal Assistant

DECLARATION OF NATHAN CLIBER IN
SUPPORT OF DEFENDANTS' OPPOSITION
TO MOTION TO DISQUALIFY - 3
2:24-cv-00808-JHC

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